



United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

May 18, 2020

BY ECF

The Honorable Paul A. Crotty
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

5-18-2020
The stay is continued
pending the Court's ruling on
the bail appeal. SO
ORDERED.

Re: *United States v. Dacheng Zhen, 20 Cr. 56 (PAC)*

Dear Judge Crotty:

The Government respectfully writes to request that the Court stay Magistrate Judge Debra Freeman's May 14, 2020, decision granting the defendant, Dacheng Zhen's, request for pretrial release until the Court has had an opportunity to rule on the Government's appeal.¹ Judge Freeman issued a stay through today's date to permit the Government an opportunity to appeal.¹ As discussed with defense counsel and the Court's deputy last week, the Government filed a written opposition to the defendant's bail request today. Defense counsel has requested an opportunity to reply to the Government's submission, and to be heard by the Court by telephone, before the Court issues its ruling.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

By:
Aline R. Flodr / Stephanie Lake /
Sheb Swett
Assistant United States Attorneys
(212) 637-1110/1066/6522

cc: Barry Zone, Esq. (by ECF)

¹ Judge Freeman's decision also requires the defendant to meet all bail conditions before he is released. Because the defendant has not yet satisfied the conditions, including by providing co-signers or the cash portion of the bond, he will not automatically be released at the expiration of Judge Freeman's stay.